

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

UNITED STATES OF AMERICA

v.

RACHA FARHAT,

Defendant.

Criminal Case No. 1:21-cr-112

**CRIMINAL INFORMATION**

**COUNT ONE**

***Conspiracy to Launder Money***

THE UNITED STATES ATTORNEY CHARGES THAT from in or around 2010, and continuing thereafter up to an including February 2021, the exact dates being unknown, within the Eastern District of Virginia and elsewhere, the defendant, RACHA FARHAT, together with others known and unknown, did unlawfully and knowingly conspire, combine, confederate and agree to transport, transmit, and transfer monetary instruments and funds from places outside the United States to places in the United States, knowing that the monetary instruments and funds involved in the transportation, transmission, and transfer represented the proceeds of some form of unlawful activity, and knowing that such transportation, transmission, and transfer was designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity, to wit: a felony violation of the International Emergency Economic Powers Act (IEEPA), in violation of Title 50, United States Code, Sections 1701 – 1707.

(In violation of Title 18, United States Code, Section 1956(h) and 1956(a)(2)(B)(i))

**COUNT TWO**  
***Conspiracy to Defraud the United States***

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT from in or about January of 2015, the exact dates being unknown, and continuing thereafter up to and including February 2020, in the Eastern District of Virginia and elsewhere, the defendant, RACHA FARHAT, and her husband Hussam Hawi ("Hawi"), did unlawfully and knowingly conspire, combine, confederate and agree to defraud the United States for the purpose of impeding, impairing, obstructing, and defeating the lawful Government functions of the Internal Revenue Service of the Treasury Department in the ascertainment, computation, assessment, and collection of revenue: to wit, income taxes.

In furtherance of the conspiracy, and to effect the objects thereof, the following overt acts were committed in the Eastern District of Virginia:

1. On or about April 26, 2016, the defendant and Hawi willfully made and subscribed, and filed and caused to be filed with the Internal Revenue Service, a false U.S. Individual Income Tax Return, Form 1040, for calendar year 2015, in that it failed to report the proper amount of taxable income by omitting the defendant's wages from her employment at the Saudi Arabian Cultural Mission ("SACM"). In 2015, the defendant earned approximately \$31,000 U.S. dollars in wages from the SACM.

2. On or about February 25, 2017, the defendant and Hawi willfully made and subscribed, and filed and caused to be filed with the Internal Revenue Service, a false U.S. Individual Income Tax Return, Form 1040, for calendar year 2016, in that it failed to report the proper amount of taxable income by omitting the defendant's wages from the SACM. In 2016, the defendant earned approximately \$39,400 U.S. dollars in wages from the SACM.

3. On or about February 24, 2018, the defendant and Hawi willfully made and subscribed, and filed and caused to be filed with the Internal Revenue Service, a false U.S. Individual Income Tax Return, Form 1040, for calendar year 2017, in that it failed to report the proper amount of taxable income by omitting the defendant's wages from the SACM. In 2017, the defendant earned approximately \$40,900 U.S. dollars in wages from the SACM.

4. On or about March 29, 2019, the defendant and Hawi willfully made and subscribed, and filed and caused to be filed with the Internal Revenue Service, a false U.S. Individual Income Tax Return, Form 1040, for calendar year 2018, in that it failed to report the proper amount of taxable income by omitting the defendant's wages from the SACM. In 2018, the defendant earned approximately \$38,400 U.S. dollars in wages from the SACM.

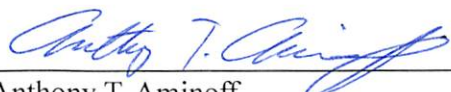
5. On or about February 21, 2020, the defendant and Hawi willfully made and subscribed, and filed and caused to be filed with the Internal Revenue Service, a false U.S. Individual Income Tax Return, Form 1040, for calendar year 2019, in that it failed to report the proper amount of taxable income by omitting the defendant's wages from the SACM. In 2019, the defendant earned approximately \$39,400 U.S. dollars in wages from the SACM.

(In Violation of Title 18, United States Code, Section 371)

Respectfully submitted,

Raj Parekh  
Acting United States Attorney

Date: May 10, 2021

By:   
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